

EXHIBIT 1

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION**

ROSE L. EPPERSON,
Individually
and as class representative for all similarly
situated persons,

Plaintiff,

v.

INTERNATIONAL PAPER COMPANY,
KERR-MCGEE
CHEMICAL CORPORATION,
KERR-MCGEE OPERATING
CORPORATION, and BNSF
RAILWAY COMPANY,

Defendants.

Civil Action No. 2:20-CV-00053

Judge James D. Cain, Jr.

NOTICE OF DEPOSITION TO EMILY W. LEE

PLEASE TAKE NOTICE that, pursuant to Rule 30(b) of the Federal Rules of Civil Procedure, Plaintiff Rose L. Epperson, by and through her attorneys, will take the deposition upon oral examination of Emily W. Lee, Remediation Manager, of Defendant INTERNATIONAL PAPER COMPANY, on Wednesday, July 9, 2025 at 10:00 a.m. at the offices of The Sanders Law Firm, LLC, located at 400 Broad Street, Lake Charles, Louisiana 70601, or at another date, time, or location agreed to by the parties.

The oral examination shall be before a notary public or other person authorized by law to administer oaths, for purposes of discovery or use as evidence in this case, or both. The deposition shall be recorded by stenographic means and audio-and-visual tape. The deposition will continue from day to day until completed.

Dated: May 30, 2025

/s/ Perry R. Sanders, Jr.

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